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Attorneys for Defendant and Counterclaimant
LIBERTY MUTUAL FIRE
INSURANCE COMPANY

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

TRAVELERS PROPERTY
CASUALTY COMPANY OF
AMERICA, a Connecticut corporation,

Plaintiff,

v.

LIBERTY MUTUAL FIRE
INSURANCE COMPANY, a Wisconsin
corporation; ZURICH AMERICAN
INSURANCE COMPANY, a New York
corporation and DOES 1 through 100
inclusive,

Defendants.

Case No. 8:22-cv-00930-SSS-KESx

**SUPPLEMENTAL DECLARATION
OF KELLEY K. BECK IN
SUPPORT OF LIBERTY MUTUAL
FIRE INSURANCE COMPANY'S
OPPOSITION TO TRAVELERS'
MOTION FOR SUMMARY
JUDGMENT**

Accompanying Documents:

Opposition; Statement of Genuine
Disputes of Material Facts;
Supplemental Declaration of Stephanie
Bright

LIBERTY MUTUAL FIRE
INSURANCE COMPANY, a Wisconsin
corporation,

Counter-Claimant

v.

TRAVELERS PROPERTY
CASUALTY COMPANY OF
AMERICA, a Connecticut corporation,

Counter-Defendant.

Date: June 7, 2024
Time: 2:00 p.m.
Dept.: Courtroom 2
Judge: Hon. Sunshine S. Sykes

Complaint filed: May 5, 2022
Trial Date: March 24, 2025

I, Kelley K. Beck, declare as follows:

1. I am an attorney at law admitted to practice before all courts in the State of California and the United States District Court for the Central District of California and am counsel of record in the above-captioned matter for Defendant and Counterclaimant Liberty Mutual Fire Insurance Company (“Liberty”). I have personal knowledge of the matters stated herein, unless stated on information and belief, and if called as a witness at trial would so testify.

2. I make this Declaration in support of Liberty’s Opposition to Travelers Property Casualty Company of America’s (“Travelers”) Motion for Summary Judgment (“Motion”).

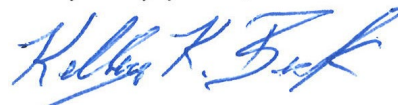
3. Travelers retained a billing expert, Jacqueline Vinaccia, to audit defense bills relative to Turner Construction Company’s (“Turner”) defense in the underlying action titled, *T-12 Three, LLC, et al. v. Turner Construction Company, et al.*, Orange County Superior Court Case Number 30-2011-00514568-CU-SU-CXC (the “Underlying Action”). A true and correct copy of Ms. Vinaccia’s expert report as produced by Travelers is attached as Exhibit 23.

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1 I declare under penalty of perjury under the laws of the United States of
2 America that the foregoing is true and correct, and that I signed this declaration in
3 Los Angeles, California on May 3, 2024.

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7 Kelley K. Beck
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